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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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RICHARD KADREY, *et al.*,

Case No. 3:23-cv-03417-VC-TSH

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Individual and Representative Plaintiffs,

**DECLARATION OF MICHELLE WOODHOUSE
IN SUPPORT OF ADMINISTRATIVE MOTION
TO FILE UNDER SEAL JOINT DISCOVERY
LETTER BRIEF AND EXHIBITS**

14

v.

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META PLATFORMS, INC., a Delaware
corporation;

Defendant.

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1 I, Michelle Woodhouse, hereby declare:

2 1. I am Associate General Counsel for Defendant, Meta Platforms, Inc. I have personal
3 knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and
4 would testify competently thereto.

5 2. I make this declaration in support of Meta's administrative motion to file under seal
6 the Parties' Omnibus briefing Re: Existing Written Discovery ("Joint Letter Brief"), Exhibits B and
7 D to the Declaration of Maxwell V. Pritt ("Pritt Declaration"), and Exhibit 6 to the Joint Letter
8 Brief. The motion seeks to have the following partially sealed or entirely sealed:

9 Document	10 Sealing Request
11 Joint Letter Brief	12 • Redacted portions
12 Exhibit B to Pritt Declaration	13 • Redacted portions
13 Exhibit D to Pritt Declaration ("Krein 14 Declaration")	15 • Redacted portions
14 Exhibit 6 to Joint Letter Brief	16 • Redacted Portions

15 3. Exhibit B to the Pritt Declaration and Exhibit 6 to the Joint Letter Brief consists of
16 excerpts of Meta's responses to Plaintiffs' Interrogatories, which contain highly confidential
17 information regarding Meta's Llama models, including highly sensitive technical information, such
18 as the datasets used to train Meta's Llama models, which have not been publicly released. Public
19 disclosure of this information exposes Meta to the risk of competitive harm.

20 4. The Krein Declaration contains detailed discussion of Meta's a highly sensitive,
21 confidential source code for its Llama models. Public disclosure of the redacted information in the
22 Krien Declaration exposes Meta to the risk of competitive harm.

23 5. The redacted portions of the Joint Letter Brief describe highly confidential
24 information contained within these sensitive, confidential exhibits and declaration, the public
25 disclosure of which would expose Meta to the risk of competitive harm.

26 6. Public disclosure of the information contained in the above-referenced materials
27 exposes Meta to the risk of competitive harm by revealing Meta's non-public business strategies,
28 technical information, and trade secret information pertaining to its generative AI offerings.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct

3 Executed in San Jose, California on this 8th day of November, 2024.

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6 Michelle Woodhouse

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